

**EXHIBIT P-0147A**

**PLAINTIFF'S TRIAL EXHIBIT**

**P-0147A**

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,  
an Indiana corporation,

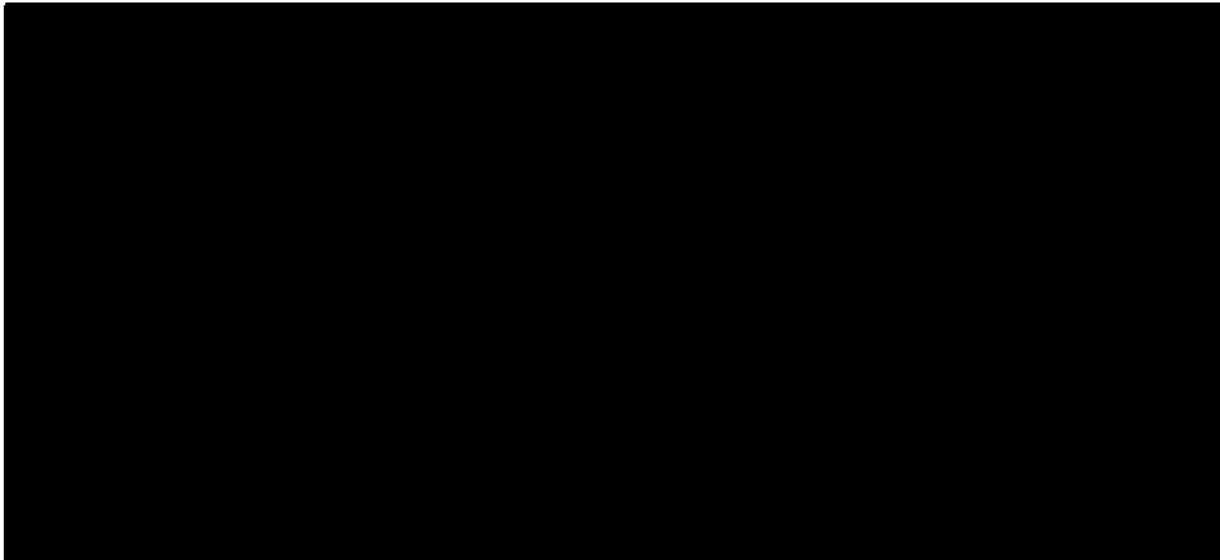
Defendant.

Court File No. 16-cv-1054 (WMW/DTS)

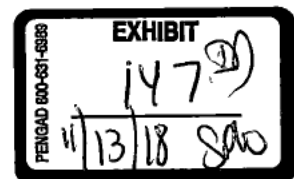
FEDERAL INSURANCE COMPANY'S  
SECOND SUPPLEMENTAL  
ANSWERS TO INTERROGATORY  
NOS. 2, 3, AND 4

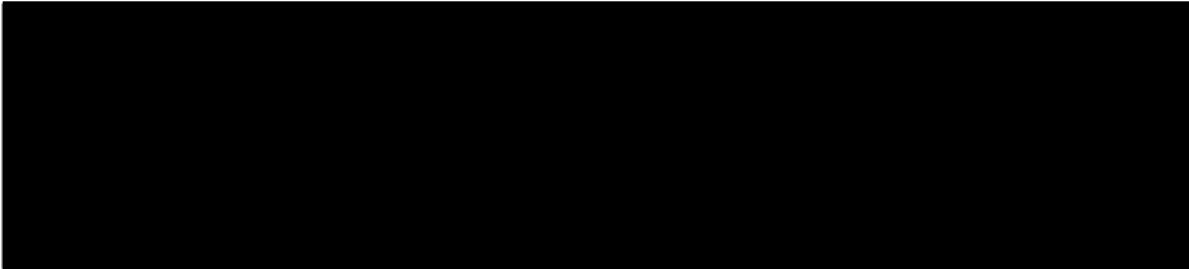
To: Plaintiff and its attorneys, Allen Hinderaker and Michael A. Erbele, Merchant & Gould PC, 3200 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402.

Defendant Federal Insurance Company ("Federal"), for its Second Supplemental  
Answers to Plaintiff's First Set of Interrogatories, states and alleges as follows:



U.S. DIST COURT MN  
PLAINTIFF EXHIBIT  
**P-0147A**  
Case No. 16-cv-1054-D S



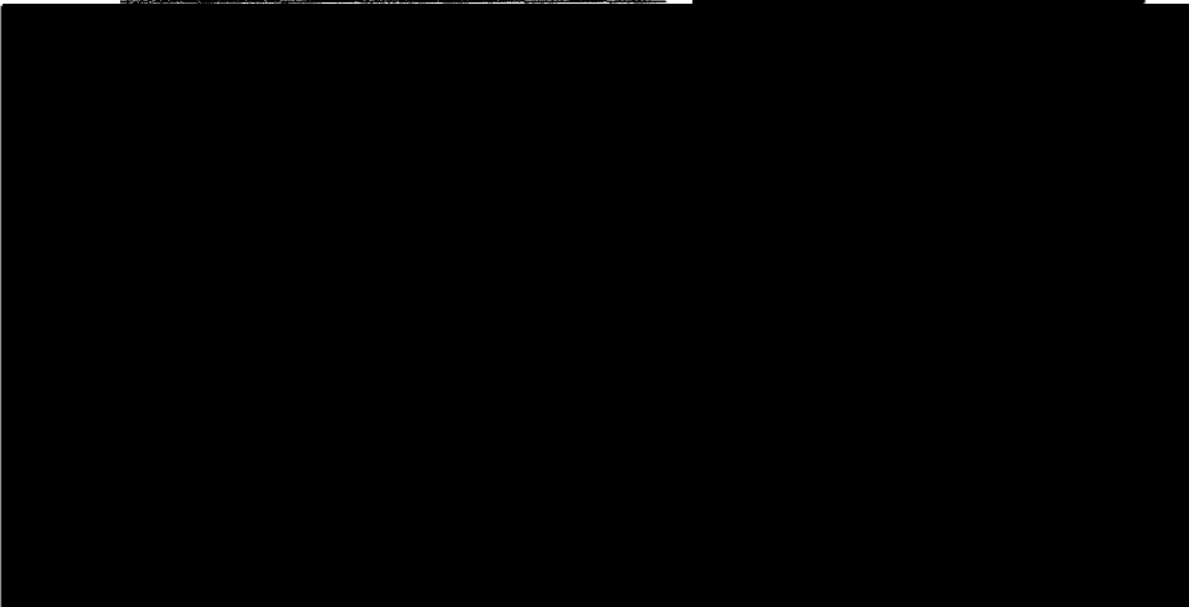


ANSWERS TO FIRST SET OF INTERROGATORIES

INTERROGATORY NO. 2: Identify every person, division, or entity, other than employees of the division Chubb & Son, to whom Federal has disclosed the FICO Blaze Advisor® software after June 30, 2006, and:

- a. State the date of each such disclosure;
- b. Identify all Persons known to you to have knowledge of each such disclosure; and
- c. Identify all documents relating to each such disclosure.

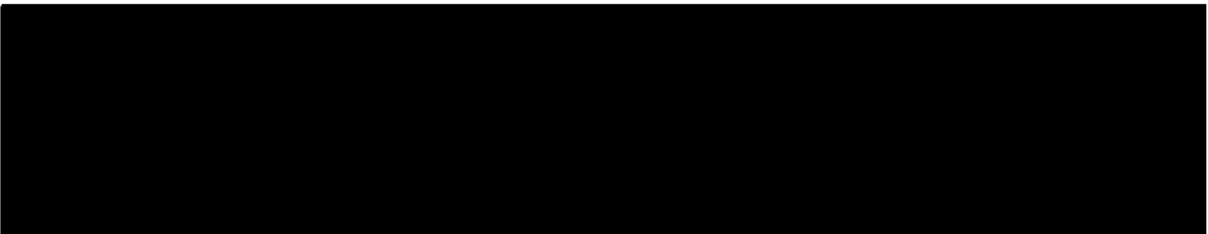
SECOND SUPPLEMENTAL ANSWER:



[REDACTED] disclosure of the Blaze Advisor software was made to at least the following: (1) Chubb Insurance Company of Europe SE, (2) Chubb Insurance Company of Canada, including through its relationship with

AppCentrica, and (3) Chubb Insurance Company of Australia Limited, including through its relationship with the DWS Group. Disclosure of the Blaze Advisor software to the Chubb & Son division of Federal occurred on or around June 30, 2006 with FICO's knowledge and participation. Information regarding the Blaze Advisor software and accessibility to it were provided on internal Chubb organization shared space. Disclosure of the Blaze Advisor software was made to Chubb Insurance Company of Canada in 2011 with FICO's knowledge and participation. Disclosure was made to Chubb Insurance Company of Europe SE at least by 2010, with FICO's knowledge and participation. Disclosure was made to Chubb Insurance Company of Australia Limited at least by 2015.

Federal identifies Tamra Pawloski, Henry Mirolyuz, Ewen Setti, Hamish Tonkin, Alexander Pavlenko, Zorica Todorovic, Tony Zhang, Lei Lanz, Dalli Yang, Duff Sorli, Ramesh Pandey, Patrick Sullivan, Benku Thomas, John White, Miranda Chiang, Mark Ruscitto, Dan Tedeschi, Kott Sivakumar, Peter Tribulski, Russell Hodey, David Gibbs, David Rowlands, Peter Davis, Dejan Stojkovic, Ken Kitamura, Ben Pullinger, Martin Sill, Craig Worth, John Fagan, Jeff Pruski, Tanya Filstein, Russell Frost, Charles Nikolas, Diptesh Patel, Oliver Clark (FICO), Michael Sawyer (FICO), Ian Brodie (FICO), and Russell Schreiber (FICO) as persons who may have knowledge regarding use of the Blaze Advisor software.

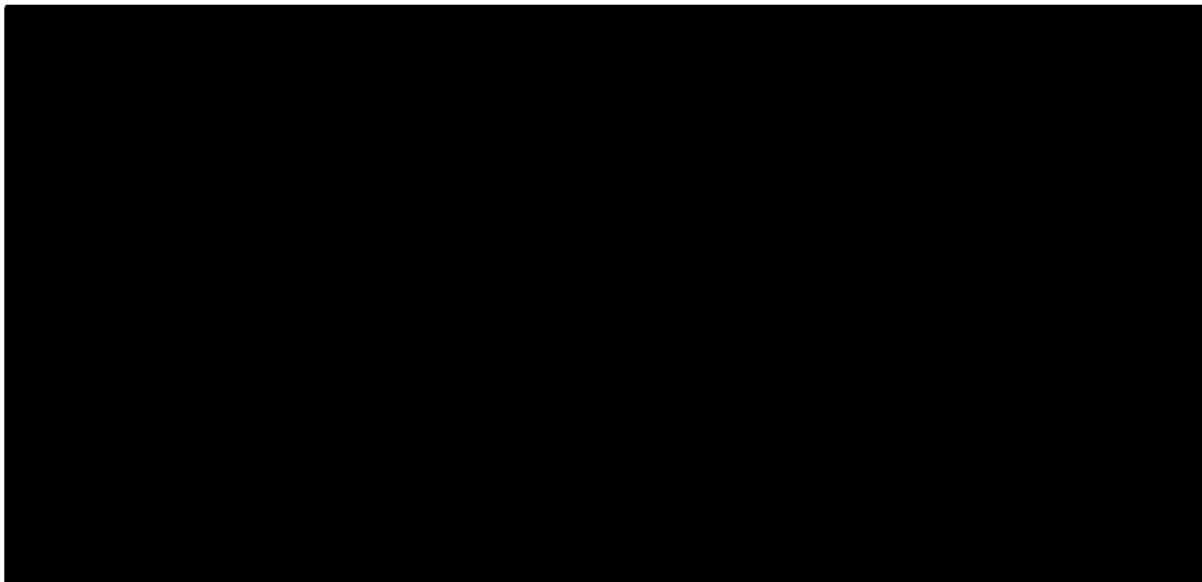




**INTERROGATORY NO. 3:** Identify every person, division, or entity, other than employees of the division Chubb & Son of which Federal is aware, that has used the FICO Blaze Advisor® software after June 30, 2006, and:

- a. State the date of first use and, if applicable, the date of the last use for each person, division, or entity;
- b. Identify all Persons known to you to have knowledge of each such use; and
- c. Identify all documents relating to each such disclosure.

**SECOND SUPPLEMENTAL ANSWER:**

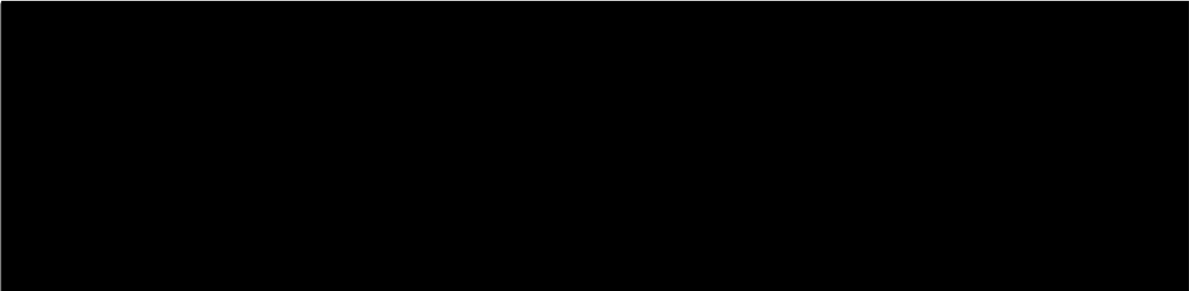


use of the Blaze Advisor

software was made by at least the following: (1) Chubb Insurance Company of Europe SE, (2) Chubb Insurance Company of Canada, including through its relationship with AppCentrica, and (3) Chubb Insurance Company of Australia Limited, including through

its relationship with the DWS Group. Federal began using the Blaze Advisor software in its Chubb & Son division on or around June 30, 2006 and did so with FICO's knowledge and participation. Information regarding the Blaze Advisor software and accessibility to it were provided on internal Chubb organization shared space. Chubb Insurance Company of Canada has used Blaze Advisor software since at least 2011, and did so with FICO's knowledge and participation. Chubb Insurance Company of Europe SE has used Blaze Advisor software since at least 2010, and did so with FICO's knowledge and participation. Chubb Insurance Company of Australia Limited has used Blaze software since at least 2015.

Federal identifies Tamra Pawloski, Henry Miroluz, Ewen Setti, Hamish Tonkin, Alexander Pavlenko, Zorica Todorovic, Tony Zhang, Lei Lanz, Dalli Yang, Duff Sorli, Ramesh Pandey, Patrick Sullivan, Benku Thomas, John White, Miranda Chiang, Mark Ruscitto, Dan Tedeschi, Kott Sivakumar, Peter Tribulski, Russell Hodey, David Gibbs, David Rowlands, Peter Davis, Dejan Stojkovic, Ken Kitamura, Ben Pullinger, Martin Sill, Craig Worth, John Fagan, Jeff Pruski, Tanya Filstein, Russell Frost, Charles Nikolas, Diptesh Patel, Oliver Clark (FICO), Michael Sawyer (FICO), Ian Brodie (FICO), and Russell Schreiber (FICO) as persons who may have knowledge regarding use of the Blaze Advisor software.



[REDACTED]

**INTERROGATORY NO. 4:** Identify every software application and/or system utilized by Chubb & Son, a division of Federal, or by any division or entity other than Chubb & Son, that utilizes in any way the Blaze Advisor® software, and:

- a. Identify all Persons known to you to have knowledge of each such software application and/or system; and
- b. Identify all documents relating to each such software application and/or system.

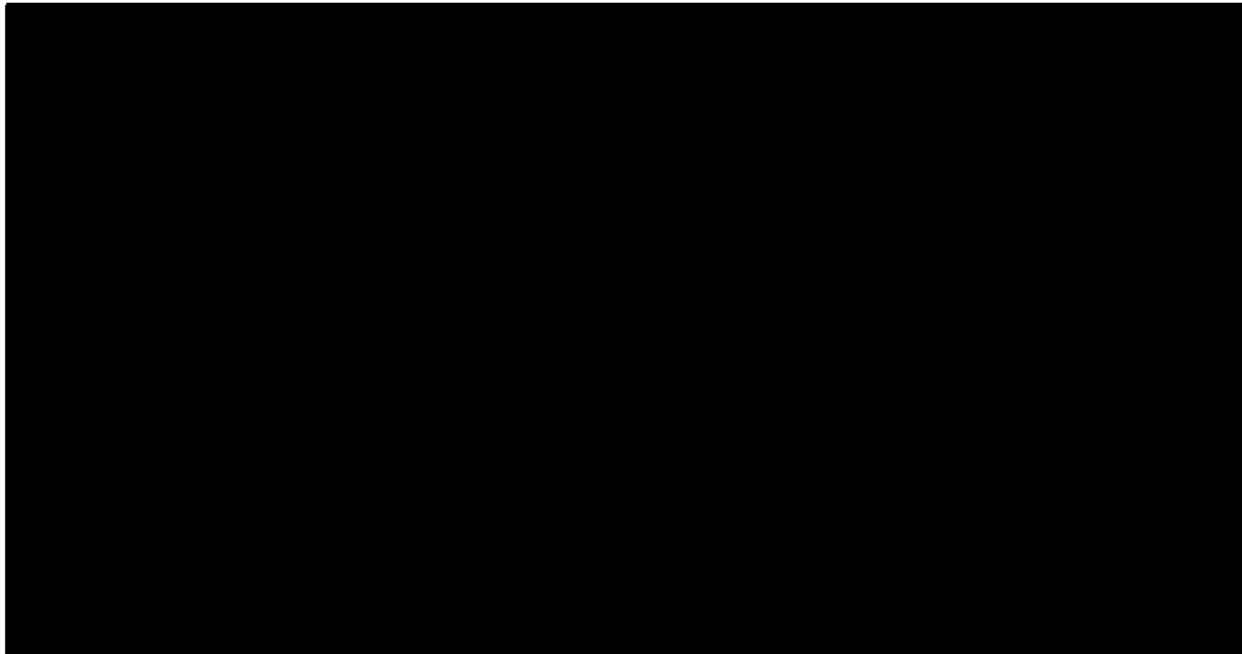
**SUPPLEMENTAL ANSWER:** [REDACTED]

[REDACTED]

[REDACTED] Federal

identifies the below business units and software applications as having utilized Blaze Advisor software:

| SBU                              | Application   |
|----------------------------------|---|
| CSI                              | CSI Express, including CIS Claims<br>Decision Point<br>Automated Renewal Process                  |
| CCI                              | CUW<br>IRMA (Individual Rate Modification Application)<br>TAPS (Texas Accident Prevention System) |
| CBS (Corporate Business Systems) | Premium Booking   |
| Surety                           | Cornerstone   |
| CAH                              | Evolution   |
| EUZ                              | Adapt-ABL<br>EZER   |







Dated: June 21, 2018

s/Terrence J. Fleming

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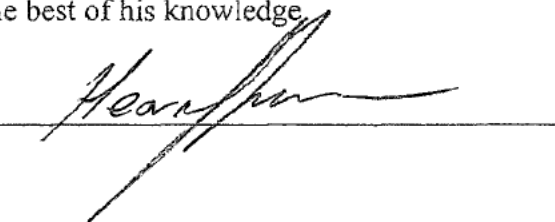
(612) 492-7000 (tel.)

(612) 492-7077 (fax)

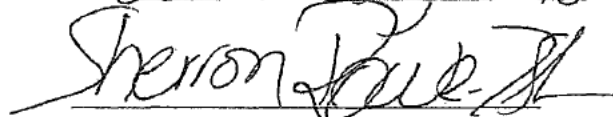
*Attorneys for Defendant*

VERIFICATION

Henry Mirolyuz states under oath that he is a Senior Systems Architect at Chubb Insurance; that he is authorized to respond to Fair Isaac Corporation's Interrogatories on behalf of Federal Insurance Company; that he has relied on directors, employees, agents, and attorneys to provide information used in formulating the answers to interrogatories; and that the answers are true and correct to the best of his knowledge.



Subscribed and sworn to before me  
this 30th day of July, 2018.



Notary Public

61909906

